

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

UNITED STATES OF AMERICA

v.

**JAMES LAEL JENSEN
MAXWELL STERLING JENSEN
a/k/a “Max”
KELLY ANNE JENSEN
ZACHARY GOLDEN JENSEN**

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Case No. 1:25:cr-257

**DEFENDANT MAXWELL STERLING JENSEN’S MOTION TO COMPEL
COMPLIANCE WITH RULE 16(a)(1)(E)**

TO THE HONORABLE COURT:

Defendant Maxwell Sterling Jensen files this Motion to Compel Compliance with Rule 16(a)(1)(E) and in support would respectfully show:

Relevant Background

1. Rule 16(a)(1)(E) requires the government to provide discovery with respect to certain documents and objects.

2. Defendant cannot comply with their reciprocal discovery obligation unless the government provides a copy of all the documents it intends to use in its case-in-chief at trial. Defendant respectfully requests that the Court order the Government to provide a copy of all the files, documents, correspondence, written interviews, etc. that it intends to use in this case.

Certificate of Conference

Pursuant to S.D. Tex. Cr. LR 12.2, counsel for Maxwell Sterling Jensen attempted to confer with Assistant United States Attorney Laura Garcia, as to her position in this Motion and as of the time of this filing was unable to confer.

Prayer

Defendant, therefore, respectfully requests that the Court grant this Motion. If the Court deems it necessary, Defendant requests the Court set a hearing to consider further evidence and arguments in this matter.

Respectfully submitted,

LAW OFFICE OF ROBERT GUERRA, PLLC

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MAXWELL STERLING JENSEN

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via e-mail on this 15th day of May 2025 to the following:

Ms. Laura Garcia Assistant United States Attorney United States Attorney's Office 600 E. Harrison, Rm 201 Brownsville, Texas 78520 Ph: (956) 548-2554 Email: laura.garcia@usdoj.gov	<input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail, RRR <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic Mail
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/s/ Robert L. Guerra, Jr.
ROBERT L. GUERRA, JR.